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14 Attorneys for Defendants  
15 CRUMBL LLC, CRUMBL, IP, LLC, and  
16 CRUMBL FRANCHISING, LLC

17 **UNITED STATES DISTRICT COURT**

18 **EASTERN DISTRICT OF CALIFORNIA**

19 LISA WATSON, and ANGELA KEERS,  
20 individually and on behalf of all those  
21 similarly situated,

22 Plaintiffs,

23 vs.

24 CRUMBL LLC, CRUMBL, IP, LLC, and  
25 CRUMBL FRANCHISING, LLC,

26 Defendants.

27 Case No. 2:23-cv-01770-DJC-CKD

28 **STIPULATION TO EXTEND CASE  
DEADLINES, INCLUDING DEADLINE TO  
SUBMIT JOINT STATUS REPORT; ORDER**

29 Complaint Filed: August 21, 2023

30 Judge Daniel J. Calabretta

31 **STIPULATION TO EXTEND CASE DEADLINES, INCLUDING DEADLINE TO SUBMIT  
32 JOINT STATUS REPORT; ORDER  
33 Case No. 2:23-cv-01770-DJC-CKD**

1 Plaintiffs LISA WATSON and ANGELA KEERS ("Plaintiffs") and Defendants CRUMBL  
2 LLC, CRUMBL IP, LLC, and CRUMBL FRANCHISING, LLC ("Defendants"), by and through  
3 their undersigned counsel, and pursuant to Civil Local Rule 144, respectfully submit this  
4 Stipulation to Extend Case Deadlines, Including Deadline to Submit Joint Status Report.

5 **WHEREAS**, Plaintiffs filed their Complaint in the above-captioned action (the  
6 "Complaint");

7 **WHEREAS**, on September 6, 2023, Plaintiffs and Defendants stipulated to a 21-day  
8 extension of the earliest deadline to respond to the Complaint by answer or motion, pursuant  
9 to Civil Local Rule 144(a), providing Defendants up to and including October 4, 2023 to file and  
10 serve their response to Plaintiffs' Complaint;

11 **WHEREAS**, on October 2, 2023, Plaintiffs and Defendants stipulated to an additional  
12 30-day extension of the October 4, 2023 deadline to respond to the Complaint by answer or  
13 motion;

14 **WHEREAS**, on October 3, 2023, the Court granted this extension, setting Defendants'  
15 deadline to respond to the Complaint by answer or motion for November 3, 2023;

16 **WHEREAS**, pursuant to the Court's Initial Case Management Order, within sixty days of  
17 the service of any party, the parties are required to confer as required by Federal Rule of Civil  
18 Procedure 26(f) and to prepare and submit to the Court a joint status report that includes the  
19 Rule 26(f) discovery plan;

20 **WHEREAS**, based on the service of the Complaint and Summons on August 23, 2023  
21 on CRUMBL IP, LLC, the deadline for the Parties to confer and to submit their joint status  
22 report is currently October 23, 2023;

23 **WHEREAS**, the Parties have been discussing possible resolution of the case since  
24 September 28, 2023, when the Parties conferred regarding Defendants' proposed motion in  
25 response to the Complaint;

26 **WHEREAS**, since then, the Parties have engaged in additional discussions regarding  
27 resolution, have begun informal discovery directed towards settlement, and are discussing  
28 scheduling a mediation before a private mediator;

STIPULATION TO EXTEND CASE DEADLINES, INCLUDING DEADLINE TO SUBMIT  
JOINT STATUS REPORT; ORDER  
Case No. 2:23-cv-01770-DJC-CKD

1       **WHEREAS**, the Parties have agreed and stipulate to Plaintiffs filing an amended  
2 complaint by October 31, 2023;

3       **WHEREAS**, the Parties have agreed and stipulate to set Defendants' deadline to  
4 respond to the amended complaint by motion or answer as forty-five (45) days after the service  
5 of the amended complaint;

6       **WHEREAS**, the Parties wish to stipulate to extend the deadline to confer pursuant to  
7 Rule 26(f) and to submit the joint status report from October 23, 2023 to thirty (30) days after a  
8 ruling on Defendants' motion to dismiss or after Defendants' answer is filed, whichever is later;

9       **WHEREAS**, good cause exists for these extensions because Plaintiffs and Defendants  
10 are continuing to explore potential resolution of the case, and have made progress in the form  
11 of agreeing to permit Plaintiffs to amend their complaint and in engaging in informal discovery;

12       **WHEREAS**, the parties agree that further discussions regarding resolution of the case  
13 would be productive, as would continuing with informal discovery and mediation;

14       **WHEREAS**, this is the third time the parties have agreed to an extension, and the first  
15 time such stipulation alters the date of any event or deadline already fixed by Court order;

16       **WHEREAS**, this stipulation does alter the date of the deadline to submit a joint status  
17 report currently fixed by Court order, extending it from October 23, 2023 to thirty (30) days  
18 after a ruling on Defendants' motion to dismiss or after Defendants' answer is filed, whichever  
19 is later;

20       **WHEREAS**, no dates have yet been set for the discovery cutoff date, the last date for  
21 hearing motions, the pre-trial conference date, or the trial date;

22       **NOW, HEREBY, THE PARTIES STIPULATE AND AGREE** that:

- 23       1. Plaintiffs shall have up to and including October 31, 2023 to file and serve their  
24       amended complaint;
- 25       2. Defendants shall have up to and including forty-five (45) days from service of the  
26       amended complaint to file and serve their response by motion or answer to the  
27       amended complaint;
- 28       3. The parties shall have up to and including thirty (30) days from a ruling on  
STIPULATION TO EXTEND CASE DEADLINES, INCLUDING DEADLINE TO SUBMIT  
JOINT STATUS REPORT; ORDER

1 Defendants' motion to dismiss, or from the date of filing of Defendants' answer,  
2 whichever is later, to confer on the Rule 26(f) topics and to submit a joint status  
3 report to the Court.

4 **IT IS SO STIPULATED AND AGREED.**

5  
6  
7 DATED: October 19, 2023

**MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN LLP**  
Alex R. Straus  
Erin Ruben  
Harper T. Segui  
Rachel Soffin

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10  
11 */s/ Erin Ruben (as authorized on Oct. 19, 2023)*  
12 Erin Ruben  
13 Attorneys for Plaintiffs  
LISA WATSON and ANGELA KEERS

14  
15  
16 DATED: October 19, 2023

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Erik K. Swanolt  
Jessica N. Walker  
Jordan C. Bledsoe

17  
18  
19  
20 */s/ Jessica N. Walker*  
21 Jessica N. Walker  
22 Attorneys for Defendants  
CRUMBL LLC, CRUMBL IP, LLC, and  
CRUMBL FRANCHISING, LLC

23  
24 **IT IS SO ORDERED.**

25  
26 DATED: October 19, 2023

*/s/ Daniel J. Calabretta*  
27 THE HONORABLE DANIEL J. CALABRETTA  
28 UNITED STATES DISTRICT JUDGE

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